



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

JUN - 7 2018

Mr. David Lennon
Project Manager
TRC
17911 Von Karman Avenue, Suite 400
Irvine, California 92614

Re: EPA Review of PCB Cleanup Report for Former Ag Park Site, Riverside, California

Dear Mr. Lennon:

The U.S. Environmental Protection Agency, Region IX ("EPA") has received the "Phase 3 Response Plan Implementation Report" ("Cleanup Report") for the former Agricultural Park (the "Site") dated May 14, 2018 that TRC submitted on behalf of Friends of the Riverside Airport, LLC ("FRA"). The Site is approximately 62 acres and is located at 7020 Crest Avenue in the city of Riverside, California.

Remedial work was performed in accordance with the "Revised Response Plan, Excavation of Soils Containing PCBs" (FREY Environmental, Inc., 2006), and the "Soil Sampling and Excavation Work Plan" (TRC, 2016) ("Cleanup Plan"), and was considered Phase 3 of the project to prepare the Site for residential development. Phase 1 of the project, which removed PCB-impacted soil to a target level of 50 milligrams per kilogram (mg/kg), was conducted in 2009. Phase 2 of the project, which removed PCB-impacted soil to a target level of 0.22 mg/kg, was conducted in 2013 and 2014. The value of 0.22 mg/kg was based on the EPA preliminary remedial goal ("PRG") for residential use at the time.

In response to public concerns, in September 2015 DTSC and EPA agreed on an approach to sample the Site with a 250-foot grid. The grid was tightened to 125 feet for follow-up sampling in November 2015. These sampling rounds indicated previously unknown areas of PCB concentrations above the Phase 2 target level. Phase 3 was initiated to address these PCB concentrations. The goal of this phase of work was to excavate, remove, and properly dispose of soils containing PCB concentrations above the following remedial goals for the Site:

- the current residential EPA regional screening level ("RSL") of 0.23 mg/kg for soils present from 0 to 10 feet below grade (fbg);
- 1.0 mg/kg for soils 10 fbg or greater and for soil beneath the proposed roadways covered by pavement.

The 1.0 mg/kg remedial goal for soils deeper than 10 fbg and below the roadways is considered safe for residential use by the EPA and DTSC.

Between August 2016 and January 2018, approximately 303,303 tons of impacted soil were removed from the Site and confirmation soil sampling was conducted to verify removal of the impacted soil above the remedial goals. In addition to confirmation soil samples taken at locations of excavations, between six and eight confirmation soil samples were taken at each proposed housing lot. All soil with sample results above the remedial goals was removed from the Site. Additional safeguards include application of a minimum of five feet of certified clean import soil over all proposed residential lots, excluding lots that have had soil removed down to granite.

The Department of Toxic Substances Control ("DTSC") has provided regulatory oversight for this project since 2005. EPA has been providing technical assistance for this project since 2015, and EPA approved the remedial strategy for Phase 3 of the project. EPA's technical assistance included the following:

- EPA took split samples at the September and November 2015 sampling events to confirm the integrity of TRC's data.
- For the November 2015 sampling event, EPA recommended that TRC take samples of PCB congeners, which are the subset of PCBs that are most toxic to human health. EPA also took split samples of the PCB congener samples.
- For the 2016-2018 cleanup, EPA analyzed at least one split sample in its Region IX laboratory for each week of remediation.
- EPA reviewed the 2016 Cleanup Plan and the 2018 Cleanup Report.

Based on the results of the sampling data, EPA concurs that the health-based remedial goals for PCB-impacted soils were achieved. EPA appreciates TRC's and FRA's implementation of the PCB cleanup at the Site. If you have any questions concerning this letter, please contact Sara Ziff at (415) 972-3536 or ziff.sara@epa.gov.

Sincerely,



Jeff Scott, Director
Land Division

cc (electronic): Maryam Tasnif-Abbasi, DTSC
Robert Beers, FRA